

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Case No. 20-32645-SGJ
	§	
MOVIE GRILL CONCEPTS LV, LLC, <i>et al.</i> , ¹	§	Chapter 11
	§	
Debtors.	§	Jointly Administered

**ORDER PARTIALLY GRANTING GUC TRUSTEE’S TENTH
OMNIBUS OBJECTION TO CLAIMS (BOOKS AND RECORDS)**

The Court considered the *GUC Trustee’s Tenth Omnibus Objection to Claims (Books and Records)* (the “Objection”) filed by Advisory Trust Group, LLC (the “GUC Trustee”), solely in its capacity as GUC Trustee of the GUC Trust (the “GUC Trust”), pursuant to which the GUC Trustee seeks to disallow and expunge or reduce, as applicable, certain Books and Records Claims because, in each instance, the proof of claim proof of claim is inconsistent with the Reorganized

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.donlinrecano.com/Clients/smgh/Index>.

Debtors' books and records and/or provides insufficient supporting documentation on which the GUC Trustee can determine that a valid claim exists; the Court having reviewed the Objection and finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), (c) venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; (d) notice of the Objection and of the hearing on the Objection was sufficient under the circumstances and no other or further notice need be provided; (e) all responses, if any, to the Objection have been withdrawn, resolved, or overruled; and (f) that good cause appears for the relief requested, it is therefore **HEREBY ORDERED THAT:**

1. The Objection is SUSTAINED as set forth herein.
2. Each of the Books and Records Claims identified on **Exhibit 1** attached hereto is disallowed and expunged in its entirety or reduced, as applicable and as set forth in the column entitled "Proposed Claim Amount," pursuant to section 502(b) of the Bankruptcy Code.
3. The GUC Trustee or the Claims Agent, as applicable, is authorized to update the Claims Register in these cases to reflect the relief granted in this Order.
4. The Order shall be immediately effective and enforceable upon its entry.
5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.
6. Each of the Books and Records Claims and the objections by the GUC Trustee and Reorganized Debtors to such Books and Records Claims, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each of the Books and Records Claims.

END OF ORDER

Respectfully submitted by:

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ Steven W. Golden
Steven W. Golden (SBT 24099681)

440 Louisiana Street, Suite 900
Houston, TX 77002
Tel: (713) 691-9385
Facsimile: (713) 691-9407
sgolden@pszjlaw.com

Robert J. Feinstein (admitted *pro hac vice*)
780 Third Avenue, 34th Floor
New York, NY 10017
Tel: (212) 561-7700
Facsimile: (212) 561-7777
rfeinstein@pszjlaw.com

Jeffrey N. Pomerantz (admitted *pro hac vice*)
10100 Santa Monica Boulevard, 13th Floor
Los Angeles, CA 90067
Tel: (310) 277-6910
Facsimile: (310) 201-0760
jpomerantz@pszjlaw.com

Counsel to the GUC Trust

EXHIBIT 1

Books and Records Claims

Books and Records Claims

REASON FOR OBJECTION						
Reduce or Disallow Claim Based on Review of Reorganized Debtors' Books and Records						
	CLAIMANT	DEBTOR NAME	CLAIM DATE	DRC CLAIM NO.	FILED CLAIM AMOUNT	PROPOSED CLAIM AMOUNT
1.	Arizona Department of Revenue	Movie Grill Concepts L, LLC	4/5/2022	682	\$35,502.49	\$0.00
2.	Capital One, N.A.	Studio Movie Grill Holdings, LLC	1/21/2021	213	\$506,085.43	\$486,212.94
3.	Carr and Duff, Inc.	Movie Grill Concepts XLII, LLC	2/17/2021	338	Unliquidated	\$0.00
4.	Conrad McDowell	Studio Movie Grill Holdings, LLC	2/17/2021	339	\$50,000.00	\$0.00
5.	CTI Surfaces, Inc.	Studio Movie Grill Holdings, LLC	2/11/2021	303	\$61,639.73	\$49,298.81
6.	Jermaine Miller	Studio Movie Grill Holdings, LLC	2/11/2021	302	Unliquidated	\$0.00
7.	Lockard Development, Inc.	Movie Grill Concepts XXXII, LLC	2/19/2021	494	\$760,161.12	\$737,827.02
8.	Lockard Development, Inc.	Movie Grill Concepts XXXII, LLC	2/19/2021	498	\$2,726,724.26	\$2,311,137.40
9.	Romanoff Electrical Residential LLC	Movie Grill Concepts XXXII, LLC	2/8/2021	262	\$365,651.83	\$0.00